

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

HARVEY LEE FUNCHES

PLAINTIFF

VS.

CAUSE NO. 3:15cv586 HTW-LRA

**CHASE E. NOLAND,
PROGRESSIVE TRACTOR
AND IMPLEMENT COMPANY, LLC,
ZIP TIE FARMS, LLC and GRIZZLY
HARVESTING, LLC**

DEFENDANTS

**PROGRESSIVE TRACTOR
AND IMPLEMENT COMPANY, LLC**

CROSS-PLAINTIFF

VS.

**CHASE E. NOLAND AND
GRIZZLY HARVESTING, LLC**

CROSS-DEFENDANTS

**DEFENDANT, PROGRESSIVE TRACTOR & IMPLEMENT COMPANY,
LLC’S JOINDER IN CO-DEFENDANTS’ MEMORANDUM IN
OPPOSITION TO PLAINTIFF’S MOTION *IN LIMINE***

COMES NOW, defendant, Progressive Tractor & Implement Company, LLC (hereinafter “PTI”), by and through its attorneys of record and hereby joins in and adopts by reference co-defendants’ Memorandum in Opposition to Plaintiff’s Motion *in Limine* [Doc 188] and would show unto the Court the following:

1.

In an effort to avoid unnecessary duplication and cluttering of the Record, PTI joins in and adopts the Memorandum in Opposition to Plaintiff’s Motion *in Limine* [188] filed by co-defendants and relies upon the same as if it were its own.

WHEREFORE, PREMISES CONSIDERED, PTI requests the Court to deny the plaintiff's separate motions *in limine* for the reasons set forth in the defendants' separate responses to said motions and the memorandum in opposition to plaintiff's motions *in limine*.

RESPECTFULLY SUBMITTED, this the 31st day of January, 2017.

**PROGRESSIVE TRACTOR & IMPLEMENT
COMPANY, LLC**

BY: /s/Michael W. Baxter
MICHAEL W. BAXTER (MSB # 2211)
MASON S. MONTGOMERY (MSB #103313)
Attorneys for Defendant, Progressive Tractor &
Implement Company, LLC

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CERTIFICATE OF SERVICE

I, Michael W. Baxter, do hereby certify that on the 31st day of January, 2017, I electronically filed the foregoing Joinder in Opposition to Plaintiff's Motion *in Limine* with the Clerk of the Court using the ECF system which sent notification of such filing to the following: Dean Andrews, Jr., Esq.; and Sam S. Thomas, Esq.

/s/Michael W. Baxter